

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**The Western Massachusetts Electric
Company**

D.T.E. 01-36 / 02-20 Phase II

**ATTORNEY GENERAL'S FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS TO THE WESTERN
MASSACHUSETTS ELECTRIC COMPANY**

- AG-1-1 Refer to Attachment 10, TCA Reconciliation. Please describe what costs are included in each of the expense categories listed and explain how the costs in each category are incurred.
- AG-1-2 Refer to Attachment 10, TCA Reconciliation. Please provide copies of all invoices for each expense category for the period 1998-2000. Clearly identify each category of expense on each invoice or in separate tables with references to specific invoices. Explain each adjustment or correction that is in excess of 5% of a monthly invoiced amount.
- AG-1-3 Please provide copies of all the FERC approved tariffs and/or contracts that support the invoiced amounts provided in response to the preceding question. For each tariff, provide the name of the company that filed the tariff for approval and the date FERC approved the tariff. Provide a copy of each tariff petition filed with FERC..
- AG-1-4 Please provide copies of all of the Company's FERC approved transmission tariffs and/or contracts that are currently in effect. Include copies of all FERC orders approving the tariffs. This response should cover all cost recovery related to the Company's own transmission investment.
- AG-1-5 Please provide copies of all of the Company's FERC approved transmission tariffs that were in effect prior to the current tariffs since 1997. Include copies of all of the FERC orders approving the tariffs. If the Company did not have a FERC approved transmission tariff in effect prior to March 1, 1998, please explain how transmission costs were recovered from the Company's retail customers and provide the most recent agreements, regulatory approvals and underlying cost studies supporting the pre-RAD retail transmission costs. This response should cover all cost recovery related to the Company's own transmission investment.

- AG-1-6 Please provide the cost of service studies supporting the Company's transmission rates currently in effect. Include all workpapers, supporting schedules and documentation and assumptions supporting the studies. This response should cover all cost recovery related to the Company's own transmission investment.
- AG-1-7 Refer to Attachment 9. Please provide copies of all invoices for standard offer service for the period January 1, 2000 through December 31, 2000. Include a summary of the invoices by vendor by month. These invoices should total \$170,520,072; if they do not, please explain differences.
- AG-1-8 Refer to Attachment 9. Please provide all invoices for the costs identified as "Qualifying Facilities (Load Reducers)." Include a summary of the invoices by vendor by month. Also provide copies of all contracts and amendments related to Load Reducers.
- AG-1-9 Refer to Attachment 9. Please provide the monthly kWh data corresponding to the dollar values appearing on lines 1-12. Explain how the kWh for lines 8, ("Qualifying Facilities (Load Reducers)" and line 9, "Final ISO-NE Adjustment" were determined.
- AG-1-10 Refer to Attachment 9. Please provide copies of all invoices supporting the "Final ISO-NE Adjustment." Explain the basis for these charges.
- AG-1-11 Refer to Attachment 10, TCA Reconciliation. Please explain the basis for the "2002 Forecasted Congestion Charges." Include all calculations, workpapers and assumptions and describe the nature of all costs included in the estimate. Provide invoices for these types of costs that the Company has incurred prior to 2002 and explain how the Company recovered the pre-2002 congestion costs.

February 14, 2003